

Steven Gellard

From: Taxi
Sent: 03 February 2022 11:39
To: Jason Agar
Subject: FW: [EXT] Door signs

From: (.....)
Sent: 02 February 2022 16:51
To: Taxi <taxi@milton-keynes.gov.uk>
Subject: [EXT] Door signs

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I am in favour in principle of the proposed new door signage as long as 'plate exempt' vehicles don't have to display them.
Also, will there be any enforcement officers out on the streets to see that vehicles adhere to the new rules?

Kind regards



Steven Gellard

From: Taxi
Sent: 04 February 2022 13:50
To: Jason Agar
Subject: FW: [EXT] Re: F

For door signs

From:
Sent: 04 February 2022 12:47
To: Taxi <taxi@milton-keynes.gov.uk>
Subject: [EXT] Re: F

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Good morning,

Thank you so much for your top services.
Really very appreciated.

As I spoke over the phone on the issue of door signs for vehicles which your kind office is due to issue and as you mentioned that council's signs will be magnetic.

It is very appropriated. Because I moved to Milton Keynes council due to my previous council's door signs were stickers. Which were stlcked on the door and someone broke into my car in the night time.

Once again, very professional, quick and caring service you provided.

Thanks With regards,

3

Steven Gellard

From: Taxi
Sent: 08 February 2022 10:02
To: Taxi
Subject: FW: [EXT] Door signs

From: :
Sent: 02 February 2022 16:07
To: Taxi <taxi@milton-keynes.gov.uk>
Subject: [EXT] Door signs

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Afternoon

I would like to object strongly to your proposal for permanent door signs for the following reasons

- 1 It wasn't long ago you were telling us on behalf of the police to remove all signage and anything that would identify the car as a taxi as they were being targeted by thieves looking for takings or change left overnight.
- 2 It's my only car if I have to leave everything on display it's a target for crime no matter where I go even simply shopping plus the often awkward and sometimes intimidating people trying to book you or get you find out where there cab is when your out with your family.
3. Past experience with stick on door signs are there not much more reliable than magnetic ones they will tear or start peeling once you've been through a car wash a few times thus defeating the exercise.

Enforce the rules you already have and punish the operator for not having adequate spares they make a good profit the drivers scrape a living without adding more costs.

4. I also question your comments about public safety. Everybody now uses a mobile phone so it's only logical they would book a taxi on it when they book on an app they can trace the cars exact location and watch it approach on screen. They and the people who still call on their phones to book get

- The drivers name
- Plate no
- The colour make and registration of the car
- Via a text message

Safety has improved massively in the industry skyline who I work for can tell you what time I picked up what time I dropped off and the route I took via a GPS trace

So can you tell us how many people have complained or been put in danger as they couldn't identify a car because of a temporary missing door sign 20 years ago I would have agreed with you but not now.

5 Could you not consider something to go on the front and rear windscreens replacing the card we stick on at the moment it works for app based taxi's and if your that confident in your supplier why are we sticking our plate on with magnets and velcro and not using them for plates instead

6 The endorsement points if you supply the sticker and it falls how's it the drivers fault.

I would like it noted I would pay more for magnetic signage as long as I could as I do now de taxi the car when not working or leaving it in a car park ect

Regards

Driver No C

Steven Gellard

From: Taxi
Sent: 03 February 2022 07:44
To: Jason Agar
Subject: FW: Door signs

FYI

From: [Redacted]
Sent: 02 February 2022 23:31
To: Taxi <taxi@milton-keynes.gov.uk>
Subject: [EXT] Door signs

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I am strongly against permanent door signs for the following reasons
I am allowed to use my vehicle for my own use and when in the past I have driven in town I have had drunks trying to get in with my family because I have had door signs on, we need to be able to remove them for our safety and to avoid confusion to the public
The operating systems used now all send the registration of the vehicle to the customer this is what they look for uber for instance don't use door signs and seem to manage ok
There is already a sign in the windscreen that identifies the mk council vehicles
Magnetic door signs are much more practical and in my experience have never been in short supply if I ever loose one it is replaced the same day
Many regards
[Redacted]
PH driver

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Steven Gellard

From: Taxi
Sent: 03 February 2022 11:38
To: Jason Agar
Subject: FW: [EXT] Private hire door signage policy

From: .
Sent: 03 February 2022 09:57
To: Taxi <taxi@milton-keynes.gov.uk>
Subject: [EXT] Private hire door signage policy

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Good morning,

Dear madam/ sir

As matter of conceren i think this is not an ideal to put more pressure financially at more cost on driver .

Secondly private hire drivers already have door signage ,its only few drivers not putting it on ,needs more licencing officer to implement this .

Records of hundreds of private hire drivers cars broken car due to vulnerability and at the end cost driver more financial burden.

I would say the current door slngage is very sufficient which is magnatic when we not working its easy to take them off make it a it safe and invulnerable to be recognise as a taxi .

Please leave it as it is, only implement it to drivers not following the rules .

Many thanks for your attention.

Best regards,

Steven Gellard

From: 04 February 2022 21:01
Sent: Taxi
To: [EXT] Regulatory committee 9 February 2022- Proposed Changes
Subject:

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Dear Regulatory Committee Members

Thank you for working to improve safety of passengers.

Firstly I will like to ask why you think there is a need to introduce the propose change as there is no evidence that having an additional council badge on private hire will improve passenger safety.

Currently all vehicle plates issues by Milton Keynes Council already have the council logo on it together with the vehicle details.

Passengers have sight of the above before boarding a vehicle. If the council wants to introduce vehicle badges then that should not be at the expense of the drivers or proprietors.

By introducing this proposed requirements, the Council is putting a burden on drivers who are already struggling for survival after such a difficult period of pandemic.

Hackney Carriage vehicle should be the target as they are allowed to ply the road without prebooking. Private hire vehicles and drivers do not have the privilege of picking up people without prebooking and therefore it makes no sense to include them in the above proposal.

I am completely opposed to the proposal on the grounds of excessive regulatory burden and also passing costs to drivers.

Thank you.

Steven Gellard

From:
Sent: 04 February 2022 15:18
To: Taxi
Subject: [EXT] PH Door sign

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Hi there,

I drive Hacney carriage licence by Milton Keynes Council. I received an email about MK Council proposing Door sign for PH Cars.

I'm against it because it will increase taxi vandalism and people will see the car and they will approach the driver to take them without booking when it's busy time. When the PH is busy time, people waiting to get PH taxi. This is the reason people will ask Driver to get in their cab without booking..

Another reason now a days most people book cab with app and mobile phone. They get exact notification which car they book.

London TFL, They have 67000 PH car. TFL DON'T USE ANY DOOR SIGN OR BACK PLATE. INSTEAD THEY USE SMALL STICKLER FRONT AND BACK. BECAUSE PEOPLE CAN'T SEE IS IT PH CAR OR PRIVATE. THIS IS THE REASON THEY HAVE LESS PIRATING/ BLAGGING.

Mk Council

I would suggest MK Council Licensing Dept will consider without plate or door sign like London TFL style sticker..

Thank you.

Badge n 

Steven Gellard

From: 06 February 2022 19:33
Sent: Taxi
To:
Subject: [EXT] Door signage

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Hi ,
Just found out that MK Council is introducing new sub law in their taxi and private hire policy, making drivers to pay and display door signs on their ph vehicles.

Now a days everyone got smartphone , jobs booked on phone , customer get notification of taxi dispatch and then arrival message along with driver,s profile pic car make model colour and number plate as well. In case of any confusion or delay customers and drivers contact with each other by provided contact number on booking.

Thats why some of councils in uk have already abolshed displaying of magnetic door signs. I don't understand how and why mk Council came to this conclusion that its driver,s responsibility to advertise private hire company and council logo and pay from his/her own pocket.

Therefore with due respect i have objection on this new sub law and would like you to please reconsider it and make the old rule more enforceable for those who don't follow it than imposing new conditions and putting more financial pressure on all individual drivers in this difficult time.

Yours truly

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Steven Gellard

From:
Sent: 06 February 2022 15:08
To: Taxi
Subject: [EXT] Don't need permanent stickers

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**Dear sir/Madem Taxi drivers are already heavily licensed, much more than other people who deal with the public.
We are licensed with plate on the back of the car, in front windscreen and also fully dbs checked.
Operators sends text message to customer with registration of vehicle so they can identify vehicle.
We don't need another permanent sticker to help customer identify vehicle.
This will confuse customer more and make us look like Hackney carriage. Definely we don't need more stickers on the car. These stickers are permanent and we have to keep on car even when we not working Another permanent symbol for thieves to break into private hire cars.**

For the attention of Milton Keynes Taxi Licensing

I wish to strongly object to the licensing officer's proposal to change the Hackney Carriage and Private hire Licensing Policy related to door signage.

The licensing officer has proposed adding additional door signs to each licensed vehicle because a small minority of drivers cannot source branded door signs from their respective operators, which undermines the public's ability to identify booked vehicles. This is misleading and incorrect to suggest that the public or customer can identify a booked vehicle from a council or operator branded door sign.

As per condition J8 of the current licensing policy, the customer identifies a booked vehicle from the registration number, the make and colour of the vehicle supplied by the operator at the time of dispatch via SMS, email or app and not from generic branded signage. Furthermore, each vehicle has a Private Hire/Hackney Carriage license plate affixed to the rear and a license identifier affixed to the nearside front screen for easy identification. Therefore, private hire vehicles are easily identifiable within the scope of the current licensing policy as per condition J8.

Adding Council branded signage to vehicles will only burden the drivers with more costs and legislation without enhancing public safety. Door signage can often have the opposite effect and confuse customers into thinking a private hire vehicle can be hailed on the street and cause potential customers to approach a stationary vehicle and attempt to hire the driver without a booking and insurance, even when the driver is off duty.

Clause 39 of The Department of Transport's, best practice guide, states that it's important for people to distinguish between a private hire vehicle and a taxi that can be legally hailed. Excessive door signage can lead to confusion in this regard and lead to more cases of illegal plying for hire and placing the public at risk. Furthermore, I strongly object to the proposal of relaxing legislation for operators and placing further requirements and potential penalties on drivers in tough economic conditions with the ongoing pandemic severely restricting demand leading to a worsening outlook in terms of living standards.

Milton Keynes Council has also failed to introduce policy changes to ensure operators are "fit and proper" and comply with the recent Supreme court ruling to ensure drivers are correctly classified as 'workers' and paid at least the minimum wage and holiday pay. By staying silent on this issue, Milton Keynes Council contributes to the 'exploitation' of workers who are often unaware of their rights and lack the confidence to fight for them. Drivers in Milton Keynes also have to compete with the influx of drivers licensed by other licensing authorities working in Milton Keynes, another issue which Milton Keynes has failed to address.

In contrast to Milton Keynes Council, other licensing authorities such as Transport for London (TfL), whose Uber drivers are working in MK, charge lower licensing fees and have a more balanced policy but still uphold very high standard in terms of public safety, for example TfL private hire vehicles are not required to have door signs as this often confuses the public with traditional London Taxis which can be hailed on the street.

In conclusion, I request that the proposed changes to the licensing policy on door signs be withdrawn as it is ineffective and will only burden the drivers with more rules and costs but zero benefits for public safety. As per current licensing policy, the vast majority of drivers comply with current legislation, and action should be taken against those who do not comply. Further, all vehicles are fitted with an external taxi or private hire license plate. The operator has already provided the registration, make and model to the customer. Thus, there is rarely any confusion for the customer in identifying pre-booked vehicles. Finally, the trade would collectively like to see Milton Keynes Council raise public awareness of workers' rights and employers' responsibilities.

This response was received from the following individuals / operators:

Dear Sir/Madam,

The regulations are already in place around advance booking, and this is just another way that the council is looking to introduce additional red tape and charge more money to the drivers when the industry is trying to recover from the impact of COVID-19.

No real financial support has been provided to the drivers and the Council is trying to put more financial burden on drivers' shoulders in this difficult time when the inflation is at highest point.... energy bills will jump more than 50% and fuel is at record high.

This consultation once again reflects that the timing is not ideal and also this is not required when the drivers and the taxi companies are fully aware that we cannot take passengers without a booking - therefore reliance on drivers is already in place and council is also fully aware that there is enforcement already in place if a private hire taxi driver breaches the rules by taking a customer without an advance booking.

It's time for the council to reflect on the consultation timing and whether there is a real need for such introductions when regulations are already in place and being policed.

This policy is not welcome at all which looks to introduce unnecessary red tape and more costs for the drivers.

All private hire customers book taxi through the APP or by phone and they get all details of Driver and Car and they do not look at signage but number plates and colour of the car. If there was a major issue with drivers touting for business, then it is understandable that the signs would be a deterrent to make the customers aware - however there is no need for it as there isn't an issue and has hardly been the case.

Focus should therefore be on other more pressing matters such as safety of drivers, financial assistance as a result of COVID-19 amongst the most pressing and important priorities especially when we are struggling to meet our livelihood costs.

As drivers we suffer the consequences of fare runners and at times most of our lives are at risk - surely the council ought to explore alternative policies to protect the industry that is constantly under unnecessary red tape.

Such signage is not needed, and common sense should apply as we all abide by the rules that govern us within our licence agreement with the MK council.

Looking forward to hearing from you and do hope that the Consultation and introduction are halted. Thank you very much.

Jason Agar

From: [REDACTED]
 Sent: 08 February 2022 15:00
 To: Taxi
 Cc: [REDACTED]
 Subject: [EXT] Re: Regulatory Committee - 9 February 2022

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Good afternoon

Please can you add our comments/queries to the agenda.

Skyline object to licensings proposal to change the policy with regards to door signs, further consultation is required and should be carried out with the trade.

Skyline is unaware of any research or consultation being carried out, how did the Council arrive at this recommendation? It would seem on the surface that these changes suit certain operators rather than enhancing public safety.

Additional Council Signs

- The proposed additional door signs do not improve safety unless they include individual details about each vehicle as per the plate and the QR code is individual to that vehicle/driver, which I doubt will be the case.
- Additional magnetic signs only add further burden onto the driver.
- How many signs are proposed per vehicle?
- Are these proposed door signs magnetic?
- If magnetic what's to stop drivers not putting them on the vehicle, how will the Council police this.... Very quickly drivers will be without any signage whatsoever (the wind must have blown it off, it was on when I started..) putting customer safety at risk.
- Drivers have to email licensing to communicate with them, how will they arrange replacement signs ad-hoc, 7 days a week?
- As Operator signs are recommended to be optional, are we expecting the public/customers to be able to record the vehicle details and/or scan a QR code when they have a problem or when they witness one.

Optional Operator Signs

- Optional operator signs will eventually lead to no operator signs being used and the public will find it more challenging to locate their vehicle.
- How will the customer know they are getting into a Skyline, SMS is not 100% reliable and only available for mobile numbers?
- Optional operator signage will increase admin for Skyline - the Police, licensing, customers and public will contact the largest operator as default trying to locate a driver/vehicle.
- Skyline door signs use an approved High Reflective Media, basically at night/low light conditions the door sign can easily be recognised by the public, customers, police, etc. Will the Council use High Reflective Media to ensure the same safety conditions?
- Skyline has always kept a stock of door signs for all drivers, we invested in our own printing press to ensure best quality and availability. Drivers should never have a problem replacing door signs.

Kind regards

On Wed, 2 Feb 2022 at 14:31, 'Joanne Odriscoll' via Management <[redacted]@management@sk.linetaxi.co.uk> wrote:

Dear Licence Holder [redacted]

The Council's Regulatory Committee will be held on Wednesday, 9 February 2022 at 6.35 pm in the Council Chamber, Civic Offices, Milton Keynes. The Committee will consider a report in regard to changes to vehicle door signage policy on Private Hire vehicles.

This report can be accessed by following the link below:

Regulatory Committee - 9 February 2022

Should a licence holder wish to speak about these changes to the Committee they must register as outlined on the front sheet of the Committee's Agenda. Please note that the public gallery currently holds a maximum of 14 people.

Alternatively, a Licence holder can email taxi@milton-keynes.gov.uk outlining his/her views on the proposed changes. Please note that these views must be made prior to 9 February 2022.

Please do not reply to this email. Any responses to this email will not be addressed.

Thanks

Taxi Licensing

Any personal data will be processed in line with the Data Protection legislation, further details at <https://www.milton-keynes.gov.uk/privacy>

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Jason Agar

From: Jason Agar
Sent: 08 February 2022 14:53
To: Taxi
Subject: [EXT] New door signage regulations

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Hi
hopefully everyone will be fine in council. really appreciate your safety concerns for public.
As a driver I just think I can say something about this new rules. I don't really think it will help with safety point of view (it's my opinion your might be different) it will definitely help to get someone else car as people when they saw it's a taxi they just try to jump in. For safety point of view if you suggest not using door signs at all so people will look for registration (provided by taxi company via sms).
As a driver it happens so many time with me I'm at the location ring the customer asking where are you and reply is we are already in taxi (we were waiting we saw taxi there and we think it's our taxi and we jump in).
I really appreciate if I could see someone in council and talk about this matter in person. I know due to covid might be it's not possible.
There are some other reasons as well like car breaking due to signage as well.
Let's hope for best. I'm sure council will take these things under consideration as well.
Regards



Sent from my iPhone

For the attention of Milton Keynes Taxi Licensing

I wish to strongly object to the licensing officer's proposal to change the Hackney Carriage and Private hire Licensing Policy related to door signage.

The licensing officer has proposed adding additional door signs to each licensed vehicle because a small minority of drivers cannot source branded door signs from their respective operators, which undermines the public's ability to identify booked vehicles.

This is misleading and incorrect to suggest that the public or customer can identify a booked vehicle from a council or operator branded door sign.

As per condition J8 of the current licensing policy, the customer identifies a booked vehicle from the registration number, the make and colour of the vehicle supplied by the operator at the time of dispatch via SMS, email or app and not from generic branded signage. Furthermore, each vehicle has a Private Hire/Hackney Carriage license plate affixed to the rear and a license identifier affixed to the nearside front screen for easy identification. Therefore, private hire vehicles are easily identifiable within the scope of the current licensing policy as per condition J8. Adding Council branded signage to vehicles will only burden the drivers with more costs and legislation without enhancing public safety.

Door signage can often have the opposite effect and confuse customers into thinking a private hire vehicle can be hailed on the street and cause potential customers to approach a stationary vehicle and attempt to hire the driver without a booking and insurance, even when the driver is off duty. Clause 39 of The Department of Transport's best practice guide states that it's important for people to distinguish between a private hire vehicle and a taxi that can be legally hailed. Excessive door signage can lead to confusion in this regard and lead to more cases of illegal plying for hire and placing the public at risk.

Furthermore, I strongly object to the proposal of relaxing legislation for operators and placing further requirements and potential penalties on drivers in tough economic conditions with the ongoing pandemic severely restricting demand leading to a worsening outlook in terms of living standards.

Milton Keynes Council has also failed to introduce policy changes to ensure operators are "fit and proper" and comply with the recent Supreme court ruling to ensure drivers are correctly classified as 'workers' and paid at least the minimum wage and holiday pay. By staying silent on this issue, Milton Keynes Council contributes to the 'exploitation' of workers who are often unaware of their rights and lack the confidence to fight for them.

Drivers in Milton Keynes also have to compete with the influx of drivers licensed by other licensing authorities working in Milton Keynes, another issue which Milton Keynes has failed to address.

In contrast to Milton Keynes Council, other licensing authorities such as Transport for London (TfL), whose Uber drivers are working in MK, charge lower licensing fees and have a more balanced policy but still uphold very high standard in terms of public safety, for example TfL private hire vehicles are not required to have door signs as this often confuses the public with traditional London Taxis which can be hailed on the street.

In conclusion, I request that the proposed changes to the licensing policy on door signs be withdrawn as it is ineffective and will only burden the drivers with more rules and costs but zero benefits for public safety. As per current licensing policy, the vast

majority of drivers comply with current legislation, and action should be taken against those who do not comply. Further, all vehicles are fitted with an external taxi or private hire license plate. The operator has already provided the registration, make and model to the customer. Thus, there is rarely any confusion for the customer in identifying pre-booked vehicles. Finally, the trade would collectively like to see Milton Keynes Council raise public awareness of workers' rights and employers' responsibilities.



Figure 1, example of current driver door signs displayed on private vehicles

Date: 8th February 2022

Dear Milton Keynes Licensing Committee

Private Hire Vehicle Door Signage

I am writing with regard to your proposal to require licensed private hire vehicles to permanently display Milton Keynes branded signs on the doors of licensed vehicles. The App Drivers & Couriers Union is a trade union listed by the Certification Officer and is the largest trade union nationally as well as in Milton Keynes for licensed private hire drivers.

On behalf of our members, we would like to set out our objections to this proposal on public safety and cost grounds.

1. Transfer of regulatory responsibility from licensed operators to licensed private hire drivers.

The reason given for this proposed change in regulation is because *“private hire operators have, at times, been unable to meet the demand for private hire door signage.”* We respectfully suggest that it is wrong and inappropriate for the council to transfer responsibility from licensed operators, some of whom are extremely large multinational transport operators, to local drivers. Further, we suggest that the Council's action can lead to further negative effects and unintended consequences.

We suggest that it is false and unacceptable for operators to say that they are unable to meet the demand for private hire door signage and for the Council to accept this state of affairs. Even if this was true, the Council has not explained how shifting the burden to drivers will improve the supply and demand problem for door signage. We suggest that operators have been unwilling, rather than unable, to meet the demand and fulfill their regulatory obligation.

We further suggest that it is unfair that drivers will now face tough enforcement action for not displaying door signs when until now the council has been unwilling to enforce against operators before now transferring the burden to drivers.

2. Unintended reduction in passenger safety.

We do not agree that passenger safety is improved by simply displaying council signs. The key issue for passengers is that they must have an advanced booking. Rather than looking for vehicles with door signs, passengers should be conditioned to check that the vehicle registration and license plate details match those confirmed in the passenger booking. Operators should be required to transmit license and vehicle registration details to the passenger in advance of the booking. This is the

only secure way for a passenger to ensure that they get in the correct pre-booked vehicle and will be tracked and properly insured for the journey. This is already a clear requirement in London.

Door signs of the nature proposed will create confusion in the minds of drivers between what is a licensed private hire vehicle, which must be pre booked, and a licensed hackney carriage which can be street hailed. The risk is that passengers will be more likely to approach vehicles without a booking to demand instant transport without a booking or to sit in the vehicle whilst a booking is then made. This situation represents a threat to the safety of passengers and drivers. It is for this reason that Transport for London has considered that private hire vehicle signage other than the license identifier must be strictly prohibited. It seems extraordinary that the Milton Keynes licensing committee can come to an opposite conclusion.

Further, we note that Milton Keynes council has long placed passengers at risk by failing to enforce the Local Government (Miscellaneous Provisions) Act 1976 which requires operators to maintain a contract with the passenger for the provision of transport.

For the purposes of this Part of this Act every contract for the hire of a private hire vehicle licensed under this Part of this Act shall be deemed to be made with the operator who accepted the booking for that vehicle whether or not he himself provided the vehicle.

Instead, most operators have transferred the burden of contract and operational risk to drivers. Recently the High Court ruled in our favor against Uber, making all contracts under the London Act must now be between the passenger and the licensed operator.

Although the case related to the 1998 London Private Hire Vehicles Act the bench did offer some legal analysis of the 1976 Act at paragraph 31 as follows:

Section 56 of the 1976 Act, set out above, supports this view. It provides that every contract for the hire of a licensed private hire vehicle outside London shall be deemed to be made with the operator who accepted the booking for that vehicle whether or not he himself provided the vehicle. That demonstrates a clear parliamentary intention that the operator should undertake contractual responsibility. The language of the 1998 Act is different, but there is no reason for any different parliamentary intention in relation to private hire vehicle services in London.

<https://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2021/3290.html>

Just as with Section 56 requirements, with door signage it seems as if Milton Keynes council has yet again abdicated its responsibility to passengers by relaxing regulations on multinational operators and transferring the burden to exploited private hire drivers largely drawn from the local BAME community.

3. Worker rights Implications

It is established in case law that the requirement to wear uniforms and to display employer branding while at work is one of the key tests in confirming the existence of an employment relationship. For this reason, many operators have been keen to remove the regulatory requirements of identifying their vehicles. Compare the current situation in Milton Keynes with the inability to supply signage to the US where no such employment rights obligations exist and operators such as Uber and Lyft absolutely insist on the display of their branding in vehicles. We suggest that the current crisis is one that has been manufactured by licensed operators who seek to weaken driver worker rights claims. The licensing committee should not tolerate operators who fail to uphold licensing standards as a means to weakening worker rights instead of unwittingly facilitating such worker rights abuses.

4. Cost burden

By raising the license fee, the Council is directly transferring not only the regulatory burden from operators to drivers from operators but also the cost burden too. The regulatory regime is clear on this point, and while the licensed driver may also be the owner of the licensed vehicle it is only the operator that can offer the vehicle for hire through their booking channels. It therefore should be solely the cost burden of the operator to pay for any and all required signage.

5. Driver safety & right to private life

Unlike licensed hackney carriages, private hire vehicles are private vehicles licensed for hire and reward. The vehicles are used privately by Milton Keynes families for their personal use to go shopping, to do the school run, to attend regular worship. The vehicles already carry Milton Keynes license plates. To now demand that drivers also display large vehicle door signs at all times is unfair and unnecessary. Further, our experience shows that such signs present a security risk as such vehicles are frequently targeted for break ins for thieves who mistakenly have the impression that cash may be stored in the vehicle.

It is our hope that Milton Keynes council will consider in good faith our objections to this misconceived and unfair regulatory change. We are available at any time to discuss our concerns and to engage in finding better solutions that maximize passenger and driver safety as well as apportion the regulatory burden fairly between drivers and operators. It is our hope that we can reach such a solution in order to avoid industrial action in the city.

Sincerely,


ADCU President


App Drivers & Courier Union